

**UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS**

EK VENTURES I, LLC; DAVID L. TAYLOR;
DAVID L. TAYLOR AND VIRGINIA L.
TAYLOR as TRUSTEES FOR THE TAYLOR
FAMILY REVOCABLE TRUST; and
FLEXTRONICS INTERNATIONAL LTD.,

Plaintiffs,

v.

JAMES R. BARTLETT and Z.B.R.
PUBLICATIONS, INC.,

Defendants.

and

JAMES R. BARTLETT,

Third Party Plaintiff

v.

GLOBALWARE SOLUTIONS, INC.,
ANTHONY RUDSTON and BRADLEY A. JAY,

Third Party Defendants.

CIVIL ACTION

No. 03 CV 12506 NMG

**PLAINTIFFS' MOTION TO COMPEL DEFENDANT ZBR
TO RESPOND TO DISCOVERY REQUESTS**

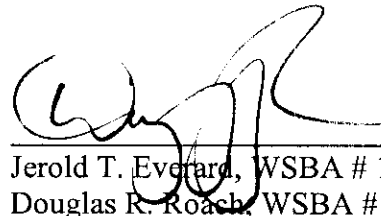
Pursuant to Fed.R.Civ.P. 37(a) and LR 37.1, Plaintiffs move this court for an order compelling Defendant ZBR Publications, Inc. ("ZBR") to provide substantive responses to Plaintiffs' First Interrogatories and Requests for Production of Documents.

As grounds therefor, Plaintiffs incorporate the accompanying Memorandum In Support of Plaintiffs' Motion To Compel Defendant ZBR to Respond To Discovery Requests.

For the reasons set forth in that memorandum, Plaintiffs request that the Court enter an order compelling Defendant ZBR Publications, Inc. to Respond to its outstanding discovery requests, and imposing terms on Defendant ZBR, its counsel, or both.

Dated this 24th day of November, 2004.

Respectfully submitted on behalf of the
Plaintiffs, EK Ventures I, LLC; David L.
Taylor; David L. Taylor and Virginia L.
Taylor as Trustees for the Taylor Family
Revocable Trust; and Flextronics
International Ltd.



Jerold T. Everard, WSBA # 17142

Douglas R. Roach, WSBA # 21127

Admitted Pro Hac Vice

GROFF MURPHY TRACHTENBERG
& EVERARD

300 East Pine Street

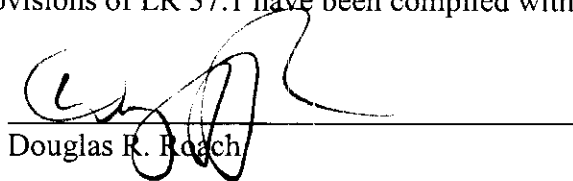
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CERTIFICATE OF COMPLIANCE

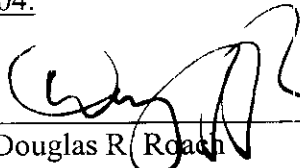
The undersigned certifies that the provisions of LR 37.1 have been complied with.



Douglas R. Roach

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for all parties via first-class mail/electronically on November 24, 2004.



Douglas R. Roach